Canyon Fuel Company, LLC
SUFCO Mine
397 South 800 West
Salina, UT 84654
(435) 286-4880 Fax: (435) 286-4499

Incoming
C/041/002
#1653

August 12, 2003

Permit Supervisor
Utah Coal Regulatory Program
1594 West North Temple, Suite 1210
Box 145801
Salt Lake City, Utah 84114-5801

Re: Minor Modification M&RP Permit Amendment, Abandoned Mining Equipment 2LPE, Canyon Fuel Company, LLC, SUFCO Mine C/041/002

Dear Permit Supervisor:

In an effort to reduce the risk to personal safety of our miners SUFCO is submitting this plan to abandon the 2LPE longwall mining conveyor tail drive and panline in the 1LPE and 2LPE gate roads. See attached map Figure 7-7, "Abandoned Mining Equipment Locations." During a longwall move the panline needs to be removed quickly so that the longwall shields can be removed and the area supported before the roof falls in as each shield is dragged to the headgate. This requires that the panline sections be moved a short distance to speed up the removal process. To haul the panline sections out of the mine requires them to be reloaded and hauled ten miles out of the mine with large heavy equipment. Operating and working around heavy equipment in the confined spaces of the mine entrees has been the largest cause of major injuries and has resulted in two fatalities at the SUFCO mine. There is more risk of personal injury to the miners handling and hauling these panline sections out of the mine with heavy equipment in confined spaces than any risk to environmental harm by leaving the equipment in sealed areas in the mine. Hauling the conveyor tail drive and panline outside would create an unnecessary risk to the workers.

The mining equipment to be abandoned includes:

1) One longwall face conveyor tail drive manufactured by DBT weighing approximately 51 tons. The drive motor and gearbox will be removed from the tail drive.
2) Fifty-two longwall face conveyor panline sections manufactured by DBT. Each panline section weighs approximately 9.7 tons.

No hazardous or toxic substances are contained in the equipment to be abandoned. A considerable tonnage of ferrous materials, such as steel roof bolts, steel roof mats, wire mesh, and metal cribs used in support pillars, is routinely abandoned in underground coal mines because the materials cannot be removed without endangering the lives of miners. The amount of additional steel in the equipment to be abandoned is probably not significant considering the amount routinely abandoned during underground mining operations during the life of a mine. Since the equipment is steel and not too different compositionally from the roof support throughout the mine, contamination to ground water from abandoned equipment will cause minimal, if any, disturbance to the hydrologic balance within the permit and adjacent areas and is not expected to cause material damage outside the permit area. Any potential adverse impacts will be observed in surface and groundwater monitoring currently being conducted.

Page 7-38E has been revised for the Probable Hydrologic Consequences (PHC), which discusses the abandonment of the mining machinery and describes the potential for any Hydrologic impacts as a result of the abandonment.

The enclosed eight copies of materials are being submitted for the SUFCO mine plan to abandon mining equipment in 1LPE and 2LPE. Forms C1 and C2 are included showing changes needed in Chapter 7.

Only those pages with text modifications in Chapter 7 are being submitted.

Sincerely,
CANYON FUEL COMPANY, LLC
SUFCO Mine

L. Craig Hilton

for Kenneth E. May
Mine Manager

Encl.

KEM/MLD:kb

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APPLICATION FOR COAL PERMIT PROCESSING

Permit Change ☒ New Permit ☐ Renewal ☐ Exploration ☐ Bond Release ☐ Transfer ☐

Permittee: CANYON FUEL COMPANY, LLC
Mine: SUFCO MINE **Permit Number:** C/041/002
Title: Abandoned Mining Equipment 2LPE
Description, Include reason for application and timing required to implement:

Instructions: If you answer yes to any of the first eight (gray) questions, this application may require Public Notice publication.

☐ Yes ☒ No 1. Change in the size of the Permit Area? Acres: _____ Disturbed Area: _____ ☐ increase ☐ decrease.
☐ Yes ☒ No 2. Is the application submitted as a result of a Division Order? DO# _____
☐ Yes ☒ No 3. Does the application include operations outside a previously identified Cumulative Hydrologic Impact Area?
☐ Yes ☒ No 4. Does the application include operations in hydrologic basins other than as currently approved?
☐ Yes ☒ No 5. Does the application result from cancellation, reduction or increase of insurance or reclamation bond?
☐ Yes ☒ No 6. Does the application require or include public notice publication?
☐ Yes ☒ No 7. Does the application require or include ownership, control, right-of-entry, or compliance information?
☐ Yes ☒ No 8. Is proposed activity within 100 feet of a public road or cemetery or 300 feet of an occupied dwelling?
☐ Yes ☒ No 9. Is the application submitted as a result of a Violation? NOV # _____
☐ Yes ☒ No 10. Is the application submitted as a result of other laws or regulations or policies?
Explain: _____
☐ Yes ☒ No 11. Does the application affect the surface landowner or change the post mining land use?
☐ Yes ☒ No 12. Does the application require or include underground design or mine sequence and timing? (Modification of R2P2)
☐ Yes ☒ No 13. Does the application require or include collection and reporting of any baseline information?
☐ Yes ☒ No 14. Could the application have any effect on wildlife or vegetation outside the current disturbed area?
☐ Yes ☒ No 15. Does the application require or include soil removal, storage or placement?
☐ Yes ☒ No 16. Does the application require or include vegetation monitoring, removal or revegetation activities?
☐ Yes ☒ No 17. Does the application require or include construction, modification, or removal of surface facilities?
☐ Yes ☒ No 18. Does the application require or include water monitoring, sediment or drainage control measures?
☒ Yes ☐ No 19. Does the application require or include certified designs, maps or calculation?
☐ Yes ☒ No 20. Does the application require or include subsidence control or monitoring?
☐ Yes ☒ No 21. Have reclamation costs for bonding been provided?
☐ Yes ☒ No 22. Does the application involve a perennial stream, a stream buffer zone or discharges to a stream?
☐ Yes ☒ No 23. Does the application affect permits issued by other agencies or permits issued to other entities?

Please attach four (4) review copies of the application. If the mine is on or adjacent to Forest Service land please submit five (5) copies, thank you. (These numbers include a copy for the Price Field Office)

I hereby certify that I am a responsible official of the applicant and that the information contained in this application is true and correct to the best of my information and belief in all respects with the laws of Utah in reference to commitments, undertakings, and obligations, herein.

for L. CRAIG HILTON
KENNETH E. MAY, MINE MANAGER
Print Name

L. Craig Hilton Tech. Serv Man 8/12/03
Sign Name, Position, Date

Subscribed and sworn to before me this 12th day of August, 20 03

Ella Ruth Wayman
Notary Public

My commission Expires: _____
Attest: State of _____
County of _____

ELLA RUTH WAYMAN
NOTARY PUBLIC • STATE of UTAH
90 NORTH 500 WEST • PO BOX 98
AURORA, UT 84620
COMM. EXP. MARCH 19, 2007

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Form DOGM- C1 (Revised March 12, 2002)

APPLICATION FOR COAL PERMIT PROCESSING
Detailed Schedule Of Changes to the Mining And Reclamation Plan

Permittee: CANYON FUEL COMPANY, LLC
Mine: SUFCO MINE **Permit Number:** C/041/022
Title: Abandoned Mining Equipment 2LPE

Provide a detailed listing of all changes to the Mining and Reclamation Plan, which is required as a result of this proposed permit application. Individually list all maps and drawings that are added, replaced, or removed from the plan. Include changes to the table of contents, section of the plan, or other information as needed to specifically locate, identify and revise the existing Mining and Reclamation Plan. Include page, section and drawing number as part of the description.

			DESCRIPTION OF MAP, TEXT, OR MATERIAL TO BE CHANGED
☐ Add	☒ Replace	☐ Remove	Pages 7-iv, 7-38D and 7-38E in Chapter 7, Volume 2 of MRP.
☒ Add	☐ Replace	☐ Remove	Add new Pages 7-38F and 7-38G in Chapter 7, Volume 2 of MRP.
☐ Add	☐ Replace	☐ Remove	
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Any other specific or special instruction required for insertion of this proposal into the Mining and Reclamation Plan.

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7.6.3.2 Removal of Siltation Structures 7-88
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7.6.5 Permanent Casing and Sealing of Wells 7-89

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Water discharged from the mine will continue to be monitored at sites Link Portal West and Link Portal East, as part of the quarterly water monitoring program. Significant changes in water chemistry and the apparent causes will be reported to the Division.

The only actual loss of groundwater from the hydrologic balance is that water which is the difference between the average as-shipped moisture minus the inherent moisture or in-situ moisture of the coal and leaves the basin upon mining. Based on an average coal moisture loss of groundwater content of 1.8 percent and a long-term coal production rate of 6 million tons per year, approximately 80 AF/yr of groundwater is removed from the basin. This represents about 2 percent of the average annual flow of Quitchupah Creek above Link Canyon.

Potential Hydrocarbon Contamination. Diesel fuel, oils, greases, and other hydrocarbon products are stored and used at the site for a variety of purposes. Diesel and oil stored in above-ground tanks at the mine surface facilities may spill onto the ground during filling of the storage tank, leakage of the storage tank, or filling of the vehicle tank. Similarly, greases and other oils may be spilled during use in surface and underground operations.

The probable future extent of the contamination caused by diesel and oil spillage is expected to be small for three reasons. First, because the tanks are located above ground, leakage from the tanks can be readily detected and repaired. Second, spillage during filling of the storage or vehicle tanks is minimized to avoid loss of an economically valuable product. Finally, the Spill Prevention Control and Countermeasure Plan presented in Appendix 7-6 provides inspection, training, and operation measures to minimize the extent of contamination resulting from the use of hydrocarbons at the site.

The potential for hydrocarbon contamination of the environment at the Link Canyon Substation or the reopened Link Canyon Mine Portal is minimal since no fuels or lubricants will be stored at this site. If a catastrophic failure of the transformers at the substation occurred, the minimal volume of oil would be contained behind the berm to be built around the equipment.

Periodically due to difficult recovery conditions or roof collapse, mining equipment is abandoned underground. Abandoned mining equipment locations are shown on Figure 7-7. Prior to leaving equipment underground, lubricating and hydraulic fluids are removed to the extent possible. Since the equipment is steel and not too different compositionally from the roof support throughout the mine, contamination to ground water from abandoned equipment will cause minimal, if any, disturbance to the hydrologic balance within the permit and adjacent areas and is not expected to cause material damage outside the permit area. Assuming the mine were to flood and the abandoned equipment were to be covered with water, several probable results and impacts can be evaluated:

1. Flooding of the abandoned mine might be relatively rapid, but once flooded, flow of ground water into, through, and out-of the void spaces of the mine should be slow.

2. If steel or other metals in the equipment were to oxidize, it would be at a very slow rate and the amount of iron and other metals added to the ground water at any one time would be very small.

3. Oxides of most metals are insoluble or slightly soluble in water. At temperatures expected in the mine, metal oxides would tend to precipitate as solids within the mine rather than flow in solution in the ground water. If any metal were to go into solution, concentrations would be highest near the abandoned equipment, but the volume of water in the flooded mine would dilute concentrations outside the immediate vicinity of the equipment.

4. Because of dilution and dispersion, natural seasonal fluctuations, changes in water quality would not be expected to be large enough to be detected at the surface at springs, ground-water baseflows to streams, or in discharges from the mine.

Road Salting. No salting of the mine road occurs within the permit area. This impact is not a significant concern.

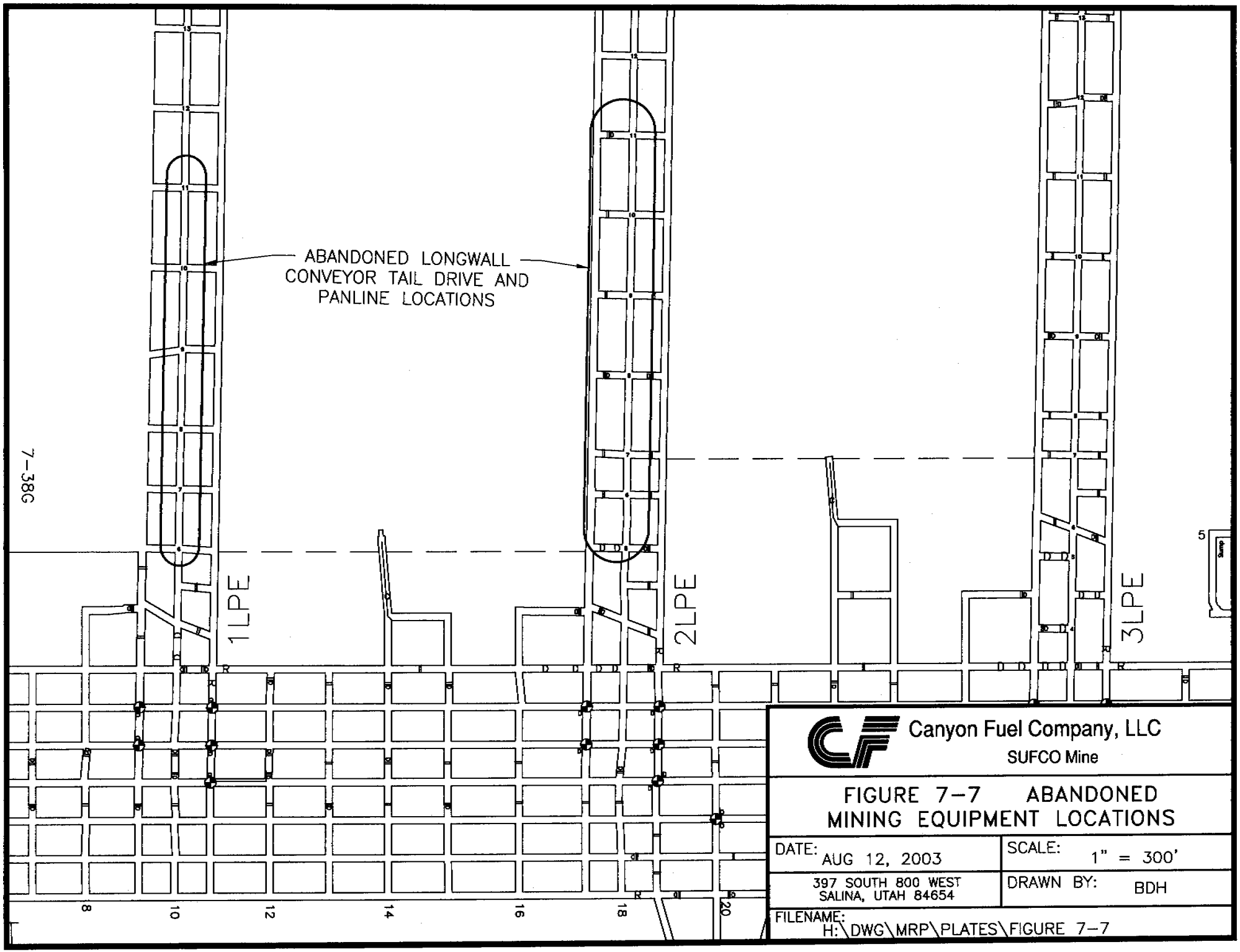
Coal Haulage. Coal is hauled over the paved county road from the mine portal area to Interstate Highway 70. Past experience has indicated that approximately one truck load of coal (43 tons) is spilled annually. Residual coal following cleanup of the spill may wash into local streams during a runoff event. Possible impacts to the surface water are increased total suspended solids and turbidity from the fine coal particulates. The probability of a spill

occurring in an area sufficiently close to a stream channel to introduce coal to the stream bed is considered small.

In order to minimize fugitive coal dust haulage trucks are either covered or modified to reduce the amount of coal dust blown off the trucks. The impact from fugitive coal dust is therefore considered to be insignificant due to the small amounts lost during haulage in the permit and adjacent areas.

7.2.9 Cumulative Hydrologic Impact Assessment (CHIA)

A Cumulative Hydrologic Impact Assessment to include the permit and adjacent areas is to be prepared by the UDOGM.



Canyon Fuel Company, LLC
SUFCO Mine

FIGURE 7-7 ABANDONED MINING EQUIPMENT LOCATIONS

DATE: AUG 12, 2003	SCALE: 1" = 300'
397 SOUTH 800 WEST SALINA, UTAH 84654	DRAWN BY: BDH
FILENAME: H:\DWG\MRP\PLATES\FIGURE 7-7	

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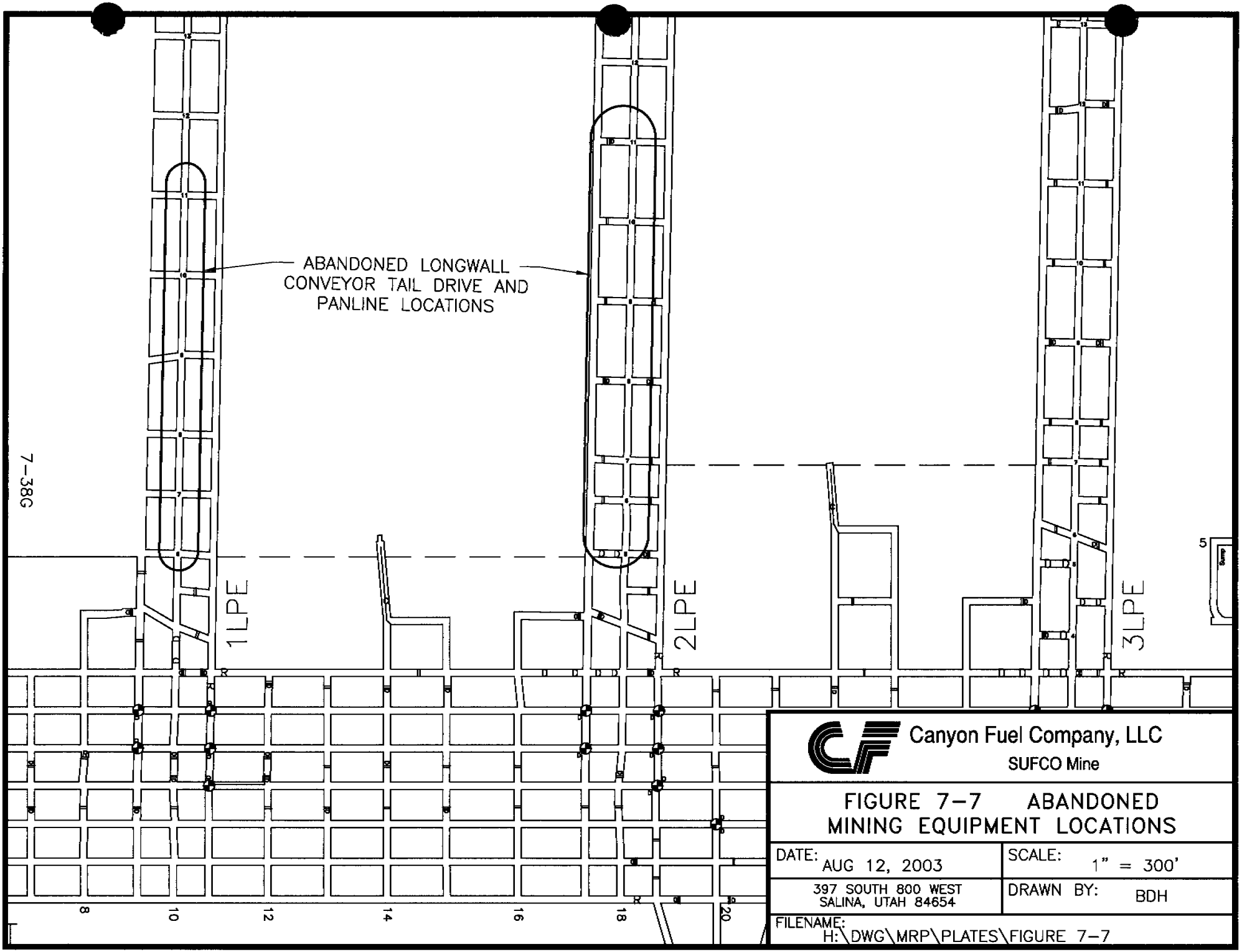

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